IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

*e*PLUS INC.,	)	
	)	
Plaintiff,	)	**Civil Action No. 3:09-CV-620 (REP)**
	)	
v.	)	
	)	
LAWSON SOFTWARE, INC.,	)	
	)	
	)	
	)	
Defendant.	)	

DECLARATION OF JAMES D. CLEMENTS IN SUPPORT OF PLAINTIFF'S REPLY IN SUPPORT OF ITS MOTION TO SHOW CAUSE WHY DEFENDANT SHOULD NOT BE HELD IN CONTEMPT OF THE COURT'S PERMANENT INJUNCTION
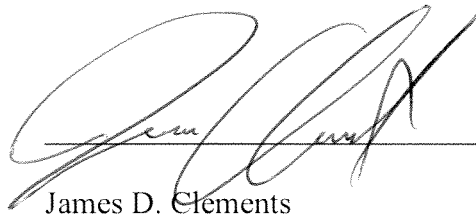
I, James D. Clements, declare as follows:

1.   I am an associate at Goodwin Procter LLP, counsel for Plaintiff *e*Plus Inc. ("*e*Plus") in this proceeding. I submit this declaration in support of *e*Plus's reply in support of its motion to show cause why Defendant Lawson Software, Inc. ("Defendant") should not be held in contempt of the Court's permanent injunction.

2.   I have personal knowledge of the facts stated herein and, if called as a witness, could and would testify competently hereto.

3.   Attached as Exhibit 1 is a true and accurate copy of excerpts from the transcript of the jury trial held in this matter from January 4 to January 27, 2011 (Dkt. Nos. 644-696).

4.   Attached as Exhibit 2 is a true and accurate copy of the transcript of the conference call held in this matter on September 15, 2011 (Dkt. No. 805).

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I declare under penalty of perjury that the foregoing is true and correct. Executed at

Boston, Massachusetts, this 23rd day of September, 2011.

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James D. Clements